

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Joseph Berti,
Debtor.

Nationstar Mortgage LLC,
Movant,

v.

Joseph Berti,
Debtor,

and

William C. Miller, Trustee,
Additional Respondent.

CHAPTER 13

BANKRUPTCY CASE NUMBER
16-11046/MDC

CERTIFICATION OF DEFAULT

Kristen D. Little, Esquire, Attorney for Movant, certifies that Debtor has defaulted upon the terms of this Court's Stipulation and Order dated April 12, 2019. It is further certified that the attached notice, marked as Exhibit "A," was served upon the Debtor and Debtor's Attorney on April 6, 2020. The Debtor has failed to cure the default as set forth in the Notice. The Debtor has failed to make the following payments:

Regular payments of \$942.75 from March 1, 2020 through April 1, 2020	\$1,885.50;
Attorney Fees associated with this default	\$300.00
Less Debtor's Suspense	\$(124.98)
TOTAL DEFAULT	\$2,060.52

Accordingly, pursuant to the Stipulation and Order, Movant respectfully requests this Court to enter the attached Order granting Movant relief from the automatic stay.

Respectfully submitted,

/s/ Kristen D. Little

Dated: April 24, 2020

BY: _____
Kristen D. Little, Esquire
Shapiro & DeNardo, LLC
3600 Horizon Drive, Suite 150
King of Prussia, PA 19406
(610) 278-6800/ fax (847) 954-4809
PA BAR ID #79992
klittle@logs.com
pabk@logs.com

S&D File #:15-049385